

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF COCHISE

STATE OF ARIZONA,

Plaintiff,

vs.

DOUGLAS PACKER,

Defendant.

GRAND JURY NO. 19-00014

CASE NO. CR2019-00043

INDICTMENT

The Grand Jurors of the County of Cochise, in the name of the State of Arizona,
and by its authority accuse:

DOUGLAS PACKER

and charge that in Cochise County:

COUNT 1

On or about January 2, 2019, **DOUGLAS PACKER** committed sexual abuse by intentionally or knowingly engaging in sexual contact with a person fifteen or more years of age without consent, to wit: touched D.K.'s breast, in violation of A.R.S. §§13-1404, 13-1401, 13-105, 13-701, 13-702, and 13-801, a class 5 felony.

COUNT 2

On or about January 2, 2019, **DOUGLAS PACKER** committed sexual abuse by intentionally or knowingly engaging in sexual contact with a person fifteen or more years of age without consent, to wit: touched D.K.'s genitals, in violation of A.R.S. §§13-1404, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 3

On or about January 2, 2019, **DOUGLAS PACKER** committed kidnapping by knowingly restraining another person with intent to inflict death, injury or sexual offense to victim, to wit: restrained D.K. to inflict sexual offenses on her, in violation of A.R.S. §§13-1304, 13-1301, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 2 felony.

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1 COUNT 4

2 On or about January 2, 2019, **DOUGLAS PACKER** committed unlawful sexual
3 conduct by, as an employee of the Cochise County Jail, intentionally or knowingly
4 engaged in any act of a sexual nature with an offender who was in the custody of the
Cochise County Jail, to wit: D.K., in violation of A.R.S. §§13-1419, 13-1401, 13-105,
13-701, 13-702, 13-703, and 13-801, a class 5 felony.

5 COUNT 5

6 On or about January 4, 2019, **DOUGLAS PACKER** committed sexual abuse by
7 intentionally or knowingly engaging in sexual contact with a person fifteen or more years
8 of age without consent, to wit: touched D.K.'s breast, in violation of A.R.S. §§13-1404,
13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

9 COUNT 6

10 On or about January 4, 2019, **DOUGLAS PACKER** committed sexual abuse by
11 intentionally or knowingly engaging in sexual contact with a person fifteen or more years
12 of age without consent, to wit: touched D.K.'s genitals, in violation of A.R.S. §§13-1404,
13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

13 COUNT 7

14 On or about January 4, 2019, **DOUGLAS PACKER** committed sexual assault by
15 intentionally or knowingly engaging in oral sexual contact, without consent, to wit: D.K.,
in violation of A.R.S. §§13-1406, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801,
a class 2 felony.

16 COUNT 8

17 On or about January 4, 2019, **DOUGLAS PACKER** committed unlawful sexual
18 conduct by, as an employee of the Cochise County Jail, intentionally or knowingly
19 engaged in any act of a sexual nature with an offender who was in the custody of the
Cochise County Jail, to wit: D.K., in violation of A.R.S. §§13-1419, 13-1401, 13-105,
13-701, 13-702, 13-703, and 13-801, a class 5 felony.

20 COUNT 9

21 On or about January 4, 2019, **DOUGLAS PACKER** committed indecent
22 exposure by exposing his genitals and another person is present and the defendant is
23 reckless about whether the other person, as a reasonable person, would be offended or
alarmed by the act, to wit: D.K., in violation of A.R.S. §§13-1402.A, 13-1401, 13-105,
13-707, 13-802, and 13-804.01, a class 1 misdemeanor.

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COUNT 10

On or about January 4, 2019, **DOUGLAS PACKER** committed indecent exposure by exposing his genitals and another person is present and the defendant is reckless about whether the other person, as a reasonable person, would be offended or alarmed by the act, to wit: E.D., in violation of A.R.S. §§13-1402.A, 13-1401, 13-105, 13-707, 13-802, and 13-804.01, a class 1 misdemeanor.

DATED this 10th day of January, 2019.

COCHISE COUNTY ATTORNEY

True Bill

BY:

Lori A. Zucco
LORI A. ZUCCO
Chief Criminal
Deputy County Attorney

Janere Moore
Foreperson of the Grand Jury

/lm